

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT, *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, *et al.*,

*Defendants.*

Case No. 1:25-cv-38-JL-TSM

**“ASSENTED-TO” MOTION FOR A 30-DAY EXTENSION  
OF DEFENDANTS’ RESPONSE DEADLINE TO APRIL 24, 2025**

Defendants hereby move, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7.2(a), for a 30-day extension of their March 25, 2025 deadline to respond to Plaintiffs’ Complaint, thus making their response due on or before April 24, 2025. In support thereof, Defendants state:

1. Plaintiffs’ Complaint was filed on January 20, 2025. ECF No. 1. Plaintiffs subsequently moved for a preliminary injunction on January 21, 2025. ECF No. 24.
2. Plaintiffs effectuated service of their Complaint on Defendants through service on the United States Attorney’s Office on January 24, 2025. *See* Fed. R. Civ. P. 4(i)(1)(A)(i)-(ii).
3. Thus, pursuant to Federal Rule of Civil Procedure 12(a)(2), Defendants’ response to the Complaint is currently due on March 25, 2025.
4. On February 10, 2025, this Court issued an Order granting Plaintiffs’ motion for a preliminary injunction, which enjoins the enforcement of Executive Order 14160, “Protecting the Meaning and Value of American Citizenship” (“Executive Order” or “EO”). ECF No. 77. As of the date of this filing, a decision has not been made on whether to appeal from that preliminary

injunction.

5. The government, however, has appealed a separate injunction against the EO issued in the consolidated *State of New Jersey et al. v. Trump et al.*, 1:25-cv-10139 (D. Mass.) litigation (hereinafter “*State of New Jersey*”) to the United States Court of Appeals for the First Circuit. *See State of New Jersey et al. v. Trump et al.*, 1:25-cv-1039, ECF No. 157 (D. Mass. Feb. 19, 2025). The First Circuit denied Defendants’ partial motion to stay the *State of New Jersey* preliminary injunction on March 11, 2025. *See State of New Jersey. et al. v. Trump et al.*, 25-1170 (1st Cir. Mar. 11, 2025).

6. On March 13, 2025, the government filed an application for a partial stay of the injunction issued in the *State of New Jersey* litigation in the Supreme Court of the United States. Any response to that application is due on April 3, 2025.<sup>1</sup>

7. Given that the government’s application to the Supreme Court remains pending and that Defendants’ deadline to respond to the Complaint is before Plaintiffs’ deadline to respond to that application, Defendants seek an additional 30 days to respond to Plaintiffs’ Complaint. Defendants submit that it would not be prudent to spend time and resources responding to the Complaint until the Supreme Court resolves the application and the First Circuit disposes of the government’s appeal in the *State of New Jersey* litigation. Defendants therefore seek a short extension of the existing response deadline.

8. Pursuant to Local Rule 7.1(c), undersigned counsel for Defendants certify that they conferred with Plaintiffs’ counsel in a good faith attempt to obtain concurrence in the relief requested in this motion, and Plaintiffs, through counsel, have stated that they consent to this relief.

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<sup>1</sup> The government also filed applications for stays of injunctions issued in two separate lawsuits against the EO. *See also Washington v. Trump*, C25-0127-JCC, 2025 WL 415165 (W.D. Wash. Feb. 6, 2025); *CASA, Inc. v. Trump*, 8:25-cv-201-DLB, 2025 WL 408636 (D. Md. Feb. 5, 2025).

9. This request is not made for purposes of delay, and no party will be prejudiced by the relief requested herein, particularly because Plaintiffs do not oppose the same. The requested extension will not result in the continuance of any hearing, conference, or trial.

10. Because this is an “assented-to” motion for an extension of time, no memorandum of law is necessary.

11. Accordingly, Defendants request a 30-day extension of the response deadline until April 24, 2025.

Dated: March 19, 2025

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants.

Dated: March 19, 2025

/s/ Yuri S. Fuchs  
Yuri S. Fuchs  
Trial Attorney